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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 CHERE B. GOOCH-MARTIN,

11 Plaintiff,

12 v.

13 CAROLYN W. COLVIN,
Acting Commissioner of Social
14 Security,

15 Defendant.

Case No.: 2:13-CV-01638-GMN-PAL

16 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
17 **(First Request)**

18 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
19 (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla K.
20 Letellier, Special Assistant United States Attorney, to request that this Court extend the time to
21 respond to Plaintiff's Motion for Reversal and/or Remand, which was filed on February 5, 2014. This
22 is Defendant's first request for an extension of time. Counsel for Defendant contacted Plaintiff's
23 counsel on March 4, 2014, and Plaintiff does not oppose Defendant's motion. Defendants' current
24 deadline is March 7, 2013.

25 The instant request is not intended to cause delay and is necessary because Defendant needs
26 additional time to consider the issues involved in this case and because of the heavy workload of

1 Defendant's attorney assigned to this case. Defendant's counsel has thirteen additional District Court
2 briefs due during the month of March, including six briefs due within a week of the deadline in this
3 case, in addition to other agency matters. Additionally, counsel will be out of the office on March 7-
4 10, 2014 and March 19-26.

5 It is therefore respectfully requested that Defendant be granted a forty-five (45) day extension
6 of time to respond to Plaintiff's motion, up to and including April 21, 2014.

7 Dated: March 4, 2014.

8 Respectfully submitted

9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/ Marla K. Letellier
12 MARLA K. LETELLIER
Special Assistant United States Attorney

13 OF COUNSEL:

14 DONNA L. CALVERT
15 Acting Regional Chief Counsel
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17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: March 7, 2014
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CERTIFICATE OF SERVICE

I, Marla K. Letellier, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

CM/ECF:

Marc V. Kalagian
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Dated this 4th day of March, 2014

/s/ Marla K. Letellier
MARLA K. LETELLIER
Assistant United States Attorney